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13 UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

17 AMERICAN FEDERATION OF
18 GOVERNMENT EMPLOYEES, AFL-CIO;
19 AMERICAN FEDERATION OF STATE
COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO; et al

Case No. 3:25-cv-01780-WHA

DECLARATION OF LEANDRA BAILEY

20 Plaintiffs.

21

22 UNITED STATES OFFICE OF PERSONNEL
23 MANAGEMENT et al

Defendants

1 I, Leandra Bailey, declare the following under penalties of perjury:

2 1. I am over 18 years of age and competent to give this declaration. This declaration is
3 based on my personal knowledge, information, and belief.

4 2. I served as a Physical Science Information Specialist at the U.S. Department of
5 Agriculture (“USDA”) Forest Service from March 24, 2024 until February 13, 2025, when I was
6 terminated. I was a probationary employee, and my probationary period was to end on March 25, 2025.

7 3. Throughout my service for the federal government, I received positive performance
8 reviews and positive feedback from my supervisors, with no negative remarks on my record. In
9 recognition of my performance, my supervisor had submitted the necessary paperwork for my
10 promotion to the next GS level. A true and correct copy of my most recent performance review, dated
11 September 30, 2024 is attached as Exhibit A.

12 4. On February 13, 2025, I received a memorandum from Deedra Fogel, the Director of
13 Human Resource Management at the USDA Forest Service, informing me that I was being removed
14 from my position. A true and correct copy of the memorandum I received is attached as Exhibit B.

15 5. Following my termination, my Department Head provided me with a physical copy of
16 a Forest Service briefing paper titled *Probationary and Trial Period Offboarding Procedures*. The
17 memorandum stated that, “All federal agencies, including the Department of Agriculture, were notified
18 on February 12, 2025, **by the Office of Personnel Management (OPM) to terminate all employees**
19 who have not completed their probationary or trial period.” A true and correct copy of the briefing
20 paper I received is attached as Exhibit C.

21 6. I am aware that another team member received the exact same termination
22 memorandum.

23
24 I declare under penalty of perjury under the laws of the United States that the foregoing is true
25 and correct. Executed this 7 day of March in Albuquerque, New Mexico.

26
27
28 
Leandra Bailey

EXHIBIT A

rive for excellence in the accomplishment of work assignments th

oals and/or Initiatives that this

STANDARDS AND MEASURE
appropriate measures of quality, qu

onment

employee's accomplishments for this element.)

employee's performance with the standards and assign an element rating.

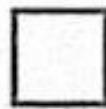
employee is accountable and responsible. .)

create a healthy working environment that fosters a positive atmosphere.

level. Include appropriate measures of quality, quantity, cost-effectiveness to achieve the "Meets Fully Successful" rating for this element.

and Safety element are provided for all employees. Supervisors can

	06/28/2024	
	06/28/2024	
	10/07/2024	



Interim Rating

ts Fully Successful
t Meet Fully Successful

EXHIBIT B

FR §212.101

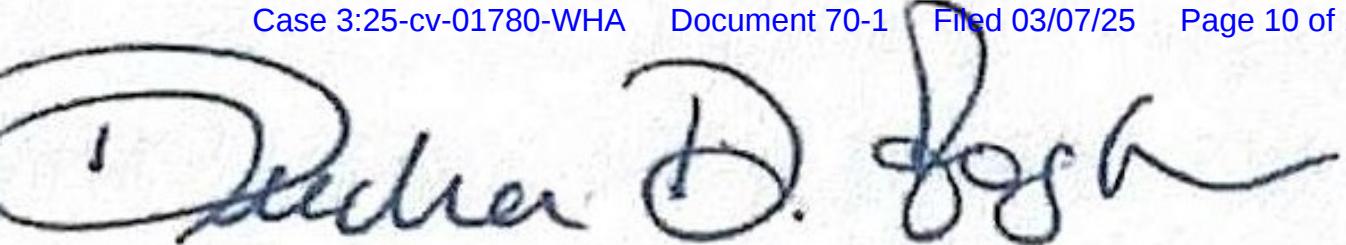
.F.R. §§ 315.803, 315.804, and 315.806
partmental Regulation 4020-250-1

ification that the Agency is removing you

eral service consistent with the above refe

agency appointed you to the position of P
ntment Standard Form 50 (SF-50), your
the agency also informed you of this require
on.

Office of Personnel Management (“OPM”
ary period is over,” and the probationary
A probationer is still an applicant for a



DEEDRA FOGLE

ector, Human Resource Management

EXHIBIT C

in probationary or trial period. To ensure appropriate due process, below are recommendations. Employees will be given written notices with an orderly offboarding.

Points for Supervisor/Leader Discussions
It is necessary to separate Probationary employees from full probationary employees are not eligible

on it is necessary to start providing notices for probationary and trial period positions starting 2024. If identified as a Probationary employee impacted by this change includes additional information about your

effective on the date employees receive notice. This process is critical to successfully closing the checklist is available at the link below. Resources through the Employee Assistance Program 12 months after separation.

or-annual-leave/.

Computers, and Mobile Devices
ment, computers, and mobile device
ffice with your supervisor's name and
EPP)

Employee Personal Page (EPP) web
ownload capability. Self-service option
ccess to personal information such as
health benefits, financial allotments,
ting, take note of your current EPP us
www.nfc.usda.gov/EPPS/eplogin.aspx

www.nfc.usda.gov/EPPS/eplogin.aspx
personal information. If you are unable
ct HR Help for assistance.
o EPP after you separate, the system w

